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5 UNITED STATES DISTRICT COURT
6 DISTRICT OF NEVADA

7 MARK GUZY,

8 Plaintiff,

9 vs.
10

11 MARY ANN GUZY,

12 Defendant.
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Case No. 3:19-cv-00129-LRH-CBC

**VERIFIED PETITION FOR
PERMISSION TO PRACTICE
IN THIS CASE ONLY BY
ATTORNEY NOT ADMITTED
TO THE BAR OF THIS COURT
AND DESIGNATION OF
LOCAL COUNSEL**

14 Patrick H. O'Neill, Jr., Petitioner, respectfully represents to the Court:

15 1. That Petitioner is an attorney at law and a member of the law firm of
16 Larson • King, LLP, with offices at 30 East Seventh Street, Suite 2800, Saint Paul,
17 Minnesota, 55101, (651) 312-6575, poneill@larsonking.com.
18

19 2. That Petitioner has been retained personally or as a member of the law firm
20 by Mary Ann Guzy to provide legal representation in connection with the above-entitled
21 case now pending before this Court.
22

23 3. That since June 1990, Petitioner has been and presently is a member in
24 good standing of the bar of the highest Court of the State of Minnesota where Petitioner
25 regularly practices law. Petitioner shall attach a certificate from the state bar or from the
26 clerk of the supreme court or highest admitting court of each state, territory, or insular
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possession of the United States in which the applicant has been admitted to practice law certifying the applicant's membership therein is in good standing.

4. That Petitioner was admitted to practice before the following United States District Courts, United States Courts of Appeal, the Supreme Court of the United States and Courts of other States on the dates indicated for each, and that Petitioner is presently a member in good standing of the bars of said Courts.

<u>Jurisdiction</u>	<u>License Number</u>	<u>Admitted</u>
Minnesota State Court	0207950	May, 1990
USDC, District of Minnesota		June, 1990
Wisconsin State Court	1050255	May, 2004
Eighth Circuit Court of Appeals		October, 1990
United States Supreme Court		December, 2003

5. That there are or have been no disciplinary proceedings instituted against Petitioner, nor any suspension of any license, certificate or privilege to appear before any judicial, regulatory or administrative body, or any resignation or termination in order to avoid disciplinary or disbarment proceedings, except as described in detail below:

None.

6. That Petitioner has never been denied admission to the State Bar of Nevada.

None.

7. That Petitioner is a member in good standing in the following Bar Associations.

1
2 Ramsey County Bar Association

3 Minnesota State Bar Association

4 American Bar Association

5 Federal Bar Association
6
7

8 8. Petitioner has filed application(s) to appear as counsel under Local Rule IA
9 11-2 (formerly LR IA 10-2) during the past three (3) years in the following matters:
10 None.
11

12 9. Petitioner consents to the jurisdiction of the courts and disciplinary boards
13 of the State of Nevada with respect to the law of this state governing the conduct of
14 attorneys to the same extent as a member of the State Bar of Nevada.
15

16 10. Petitioner agrees to comply with the standards of professional conduct
17 required of the members of the bar of this court.

18 11. Petitioner has disclosed in writing to the client that the applicant is not
19 admitted to practice in this jurisdiction and that the client has consented to such
20 representation.
21

22 The Petitioner respectfully prays that Petitioner be admitted to practice before this
23 Court FOR THE PURPOSES OF THIS CASE ONLY.
24

25 /s/ Patrick H. O'Neill, Jr.

26 Patrick H. O'Neill, Jr.
27
28

1 STATE OF MINNESOTA)
2) ss.
3 COUNTY OF RAMSEY)

4 Patrick H. O'Neill, Jr., Petitioner, being first duly sworn, deposes and says: That
5 the foregoing statements are true.

6 /s/ Patrick H. O'Neill, Jr.
7 Patrick H. O'Neill, Jr.

8 *SUBSCRIBED* and *SWORN* to before
9 me this 13th day of March, 2019.

10 /s/ Kimberly A. Lewis
11 Notary Public, Ramsey County, MN
12 My commission expires: 1/31/2020

13 **DESIGNATION OF RESIDENT ATTORNEY ADMITTED TO**
14 **THE BAR OF THIS COURT AND CONSENT THERETO.**

15 Pursuant to the requirements of the Local Rules of Practice for this Court, the
16 Petitioner believes it to be in the best interests of the client to designate Danielle L.
17 Christenson, attorney at law, a member of the State of Nevada and previously admitted to
18 practice before the above-entitled Court as associate resident counsel in this action. The
19 address and email address of said designated Nevada counsel is:
20

21
22 Heritage Law Group, P.C.
23 1625 Highway 88, Ste. 304
24 Minden, NV 89423
25 (775) 782-0040
danielle@heritagenevada.com

26 By this designation, the Petitioner and undersigned party agree that this designation
27 constitutes agreement and authorization for the designated resident admitted counsel to
28 sign stipulations binding on all of us.

The undersigned party appoints Danielle L. Christenson as her Designated Resident Nevada Counsel in this case.

Mary Ann Guzy

The undersigned hereby consents to serve as associate resident Nevada counsel in this case.

Danielle@heritagenevada.com

Dated: this 14th day of March, 2019.

United States District Judge

STATE OF MINNESOTA IN SUPREME COURT

Certificate of Good Standing

This is to certify that the following lawyer is in good standing.

PATRICK HENRY O'NEILL JR.

was duly admitted to practice as a lawyer and counselor at law in all the courts of this state on

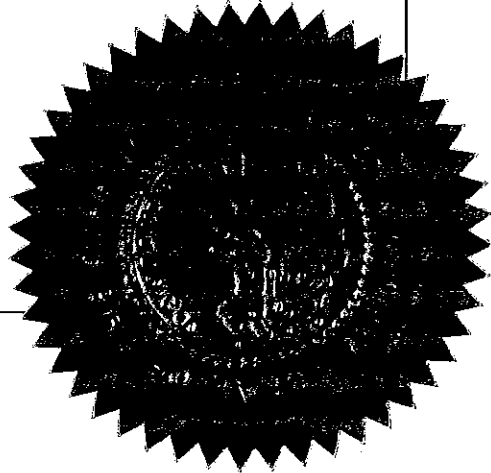
May 11, 1990

Given under my hand and seal of this court on

December 12, 2018

Emily J. Eschweiler

Emily J. Eschweiler, Director
Office of Lawyer Registration





Sheila T. Reiff
Clerk

WISCONSIN SUPREME COURT

OFFICE OF THE CLERK

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CERTIFICATE OF GOOD STANDING

I, Sheila T. Reiff, Clerk of the Supreme Court of Wisconsin certify that the records of this office show that:

PATRICK H. O'NEILL, JR.

was admitted to practice as an attorney within this state on May 17, 2004 and is presently in good standing in this court.

Dated: December 13, 2018

A handwritten signature in dark ink, appearing to read "Sheila T. Reiff", is written over the printed name.

SHEILA T. REIFF
Clerk of Supreme Court

OFFICE OF
LAWYERS PROFESSIONAL RESPONSIBILITY

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ST. PAUL, MINNESOTA 55102-1218

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TOLL-FREE 1-800-657-3601

FAX (651) 297-5801

December 13, 2018

Mr. Patrick Henry O'Neill, Jr.
30 East Seventh Street, Suite 2800
St. Paul, MN 55101

Re: Request for Disciplinary History

Dear Mr. O'Neill:

This is in response to your request and authorization for release of information in connection with your application to the bar of another state.

Our records show that you have not been subject to discipline, either public or private, and are not currently under investigation.

Policy regarding dismissed complaints. Complaints dismissed with a determination that discipline is not warranted "shall not be disclosed to any person, office or agency except to the lawyer and as between the Committees, Board, Director, Referee or this Court in furtherance of their duties under these rules." See Rule 20(b), Rules on Lawyers Professional Responsibility (RLPR). Under this rule, we cannot inform third parties of any dismissed complaints. Our reply does not imply there have been any such complaints, as we respond uniformly without regard to whether there are no complaints or only dismissed complaints. In addition, please note that Rule 20(e)(1), RLPR, provides that the Director is to expunge records relating to dismissed complaints three years after dismissal.

If you need additional information or have further questions, within the limits stated above, please contact me.

Very truly yours,

Office of Lawyers Professional
Responsibility

By Siama C. Brand
Siama C. Brand
Senior Assistant Director

amh



Supreme Court of Wisconsin

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INVESTIGATORS:
JONATHAN ZEISSER
CATHE J. HAHN
CYNTHIA SCHALLY
KATHRYN GALAROWICZ
TIMOTHY POODIACK

December 12, 2018

Attorney Patrick H. O'Neill, Jr.
Larson King LLP
30 East Seventh St., Suite 2800
St. Paul, MN 55101

Re: Admission Date: May 17, 2004
Wisconsin Bar ID No. 1050255

Dear Attorney O'Neill:

This is to certify that the undersigned is the Director of the Office of Lawyer Regulation, which is the Supreme Court agency responsible for attorney discipline and complaint records.

We have carefully examined our records and have determined that you have never been disciplined in the State of Wisconsin, nor are there any pending disciplinary proceedings against you. Moreover, no complaints or grievances have been filed against you, which are under investigation by our agency, and you are active and in good standing regarding your license to practice law in Wisconsin.

Very truly yours,

A handwritten signature of Keith L. Sellen in black ink, written over a horizontal line.

Keith L. Sellen
Director

KLS:jmb